

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:)	
)	Case No. 19-23151 JAD
Jason B. Stark,)	Chapter 13
<i>Debtor</i>)	Docket No.
)	
Jason B. Stark,)	
<i>Movant</i>)	
)	
vs.)	
)	
Nationstar, Ally Financial, LVNV Funding, Sprint Corp.,)	Conciliation Date & Time:
Atlas Acquisitions, Office of the US Trustee, and Ronda)	March 31, 2022 at 9:00 a.m.
J. Winnecour, Trustee,)	Hearing to be held via Zoom
<i>Respondents</i>)	

NOTICE OF PROPOSED MODIFICATION TO
PLAN DATED MAY 28, 2021

1. Pursuant to 11 U.S.C. § 1329, the Debtor has filed an Amended Chapter 13 Plan dated February 15, 2022, which is annexed hereto at Exhibit “A” (the “Amended Chapter 13 Plan”). A summary of the modification is set forth below in paragraphs 4 through 6 of this Notice.

2. All Objections to the Amended Chapter 13 Plan must be filed and served by no later than 21 days after the date of this Notice upon the Debtor(s), Chapter 13 Trustee and any creditor whose claim allowance or treatment is the subject of the Objection. Untimely Objections will not be considered. Any creditor who files a timely Objection to the Amended Chapter 13 Plan must appear at the scheduled Initial Confirmation Hearing on the Amended Chapter 13 Plan.

3. A virtual (via Zoom) Initial Confirmation Hearing on the Amended Chapter 13 Plan will be held on March 31, 2022, at 9:00 a.m., before the Chapter 13 Trustee. The table and meeting I.D., to participate by Zoom (and telephone number and meeting I.D. to participate by telephone if you lack the ability to participate by Zoom), can be found at <http://www.ch13pitt.com/calendar/> several days before the meeting. Parties are expected to

familiarize themselves with the Trustee's website at <http://www.ch13pitt.com/> and to comply with the procedures set forth at that site for conference participation.

4. Pursuant to the Amended Chapter 13 Plan, the Debtor seeks to modify the Plan in the following particulars:

- a. The monthly payment owed to Mr. Cooper/Nationstar has been updated to reflect the most recent notice of mortgage payment change filed.
- b. Atlas Acquisitions has been added to section 3.3 in accordance with the filed proof of claim.
- c. The unsecured pool has been decreased to \$1,450.00 based on claims filed. Repayment remains at 100%
- d. Counsel fees have been added for work associated with this amended plan.
- e. The new monthly payment is \$1,265.00 effective February 2022.

5. The proposed modification to the Plan will impact the treatment of the claims of the following creditors, and in the following particulars:

- a. Mr.Cooper/Nationstar will receive \$679.79 per month effective February 2022.
- b. Atlas Acquisitions will receive \$3.14 per month effective February 2022.

6. Debtor submits that the reason for the modification is as follows:

- a. This amended plan is being filed in accordance with the order of court dated January 19, 2022 that resolved the relief from stay litigation with NationStar.

7. The Debtor submits that the requested modification is being proposed in good faith, and not for any means prohibited by applicable law. The Debtor further submits that the proposed modification complies with 11 U.S.C. §§ 1322(a), 1322(b), 1325(a) and 1329 and, except as set forth above, there are no other modifications sought by way of the Amended Chapter 13 Plan.

WHEREFORE, the Debtor respectfully requests that the Court enter an Order confirming the Amended Chapter 13 Plan, and for such other relief the Court deems equitable and just.

RESPECTFULLY SUBMITTED, this 15th day of February, 2022.

/s/ Abagale Steidl
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